

Michael Steinmetz, Esq.  
**Garson, Ségal, Steinmetz, Flaggate LLP**  
164 West 25<sup>th</sup> Street, Suite 11 R  
New York, NY 10001  
Phone: (212) 380-3623  
Fax: (347) 537-4540  
[ms@gs2law.com](mailto:ms@gs2law.com)

*Pro Hac Vice* application filed for:

Robert Garson, Esq.  
**GS2Law PLLC**  
20801 Biscayne Blvd, Ste 506  
Miami, FL 33180  
Phone: (305) 780-5212  
[rg@gs2law.com](mailto:rg@gs2law.com)

Attorneys for Matthew Taibbi

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.: 2:25-cv-02275-EP-LDW

v.

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
ROBERT D. GARSON, ESQ.  
*PRO HAC VICE***

SYDNEY KAMLAGER-DOVE,  
Defendant.

\_\_\_\_\_ x

**PLEASE TAKE NOTICE** that on April 11, 2025 at 10:00 a.m., or as soon as counsel may be heard, the undersigned shall move, before the District Court Judge for the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102, for an Order granting Robert D. Garson to appear in this matter *Pro Hac Vice*

for the purpose of assisting in the representation of Attorneys for Plaintiff Matthew Taibbi (“Plaintiff”).

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, counsel for Plaintiff will rely upon the accompanying Certification of Michael Steinmetz, Esq., submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

DATED: April 4, 2025

New York, NY

Respectfully submitted,

**Garson Segal**  
**Steinmetz Fladgate LLP**

/s/ Michael Steinmetz  
Michael Steinmetz (MS-3164)  
  
164 W25th St, 11F  
New York, NY 10001  
212-380-3623  
[ms@gs2law.com](mailto:ms@gs2law.com)

/s/ Robert Garson  
Robert Garson  
(to be admitted pro hac vice)  
20801 Biscayne Blvd, Ste 506  
Miami, FL, 33180  
305-780-5212  
[rg@gs2law.com](mailto:rg@gs2law.com)

*Counsel for Plaintiff Matthew Taibbi*